

ERIC A. SEITZ  
ATTORNEY AT LAW  
A LAW CORPORATION

ERIC A. SEITZ 1412  
LAWRENCE I. KAWASAKI 5820  
DELLA A. BELATTI 7945  
820 Mililani Street, Suite 714  
Honolulu, Hawaii 96813  
Telephone: (808) 533-7434  
Facsimile: (808) 545-3608

Attorneys for Third-Party  
Defendant Gary W. Rodrigues

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

JEANNE K. ENDO,	)	CIVIL NO. 03-00563 LEK
	)	
Plaintiff,	)	THIRD-PARTY DEFENDANT
	)	PARTY DEFENDANT GARY W.
vs.	)	RODRIGUES' FOURTH MOTION
	)	IN LIMINE TO BAR ALL
UNITED PUBLIC WORKERS, AFSCME	)	TESTIMONY OR EVIDENCE OF
LOCAL 646, AFL-CIO,	)	GEORGIETTA CHOCK'S
	)	CLAIMS AGAINST AND
Defendant,	)	SETTLEMENT WITH UNITED
	)	PUBLIC WORKERS;
vs.	)	MEMORANDUM IN SUPPORT;
	)	CERTIFICATE OF SERVICE
GARY W. RODRIGUES,	)	
	)	
Third-Party	)	TRIAL: May 13, 2008
Defendant	)	
	)	

THIRD-PARTY DEFENDANT GARY RODRIGUES' FOURTH MOTION IN LIMINE TO  
BAR ALL TESTIMONY OR EVIDENCE OF GEORGIETTA CHOCK'S CLAIMS  
AGAINST OR SETTLEMENT WITH UNITED PUBLIC WORKERS

Comes now Third-Party Defendant GARY W. RODRIGUES  
(hereinafter referred to as "Rodrigues"), by and through his  
undersigned attorneys, and hereby moves in limine for an order

barring all testimony or evidence of Georgietta Chock's claims against or settlement with United Public Workers at trial in the above referenced case on the bases that such testimony or evidence:

1. Lacks any relevance to any of the issues in this case;
2. Will result in unfair prejudice to Rodrigues, confuse the issues in this case, and/or mislead the jury;
3. Will result in undue delay and waste of time, and;
4. Is barred by Rule 404(b), Federal Rules of Evidence.

This motion is brought pursuant to Rule 7(b) of the Federal Rules of Civil Procedure, Rules 401, 402, 403, and 404(b) of the Federal Rules of Evidence, Rule 16.9, Local Rules of Practice for the United States District Court for the District of Hawaii, and is based upon the memorandum attached hereto, the records and files in this action and such further evidence or argument which may be presented at a hearing on the motion.

DATED: Honolulu, Hawaii, April 22, 2008.

/s/ Eric A. Seitz  
ERIC A. SEITZ  
LAWRENCE I. KAWASAKI  
DELLA A. BELATTI

Attorneys for Third-Party  
Defendant Gary W. Rodrigues